

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

City of Chicago,

*Plaintiff,*

v.

DoorDash, Inc. and Caviar, LLC,

*Defendants.*

Civil Action No. 1:21-cv-05162

Hon. Jeremy C. Daniel  
Magistrate Judge Jeffrey T. Gilbert

**JOINT STATUS REPORT**

Pursuant to this Court's orders dated December 23, 2022 (ECF No. 90) and December 19, 2022 (ECF No. 87) directing the parties to file a status report seven days after each rolling production deadline to provide information about the last rolling production, what has been produced to date in total, and what remains to be produced, the parties hereby file this Joint Status Report concerning the June 7, 2024 production deadline.

**I. Status of the City's Document Productions**

**A. Documents Produced by the City To Date**

As of June 7, the City has produced 8,284 documents, totaling 58,972 pages, in rolling productions. The City's prior productions are described in more detail in the prior joint status reports (ECF Nos. 96, 101, 105, 109, 115, 151, 164, 174, 194, 200, 202, 216, 230, 234, 242, 246, 249, 250, 282, 294, 304, 308, 309, 320).

The City's May 22, 2024 production contained 440 documents and 2,122 pages. This production contained documents responsive to the following, among others:

- RFP No. 88 (documents related to the July 7, 2020 meeting titled “DoorDash – Third Party Rules Compliance Discussion”).
- RFP No. 98 (documents related to guidance issued by the City to DoorDash relating to the (a) MCC § 4-276-470, (b) MCC § 2-25-090, and/or (c) the Third-Party Food Delivery Service Rules)
- RFP No. 42 (documents related to the DoorDash’s compliance with the Third-Party Delivery Services Rules)

**B. Remaining Documents to be Produced**

The City agreed to produce documents from hard copy files, and from agreed-upon custodial searches, in response to RFP Nos. 107, 114, and 116-120. The City is also reviewing and will produce the results of agreed-upon searches for RFP Nos. 43, 91, 92 and 97. The City continues to review its overall production for completeness. The City produced an updated privilege log on May 9. The City will supplement the log to reflect privileged documents identified in any future searches agreed to in the parties’ discovery negotiations or directed by the Court.

**II. Status of DoorDash’s Document Productions**

**A. Documents Produced by DoorDash to Date**

DoorDash did not make a production on June 7, 2024. Since August 2022, DoorDash has produced a total of 7,668 documents and 39,161 pages across 26 productions. The documents produced to date include:

- Custodial documents responsive to the City’s document requests relating to minimum amount promotional discounts, non-partner restaurants, Dasher pay, consumer fees, and menu pricing;
- Documents identified in known non-custodial locations;
- Documents identified from DoorDash’s review of documents produced in related investigations and litigations; and

- Spreadsheets that were created in order to respond to the City's requests for specific data.

Additionally, DoorDash served its privilege log on the City on March 22, 2024.

**B. Remaining Documents to be Produced**

DoorDash is in the process of collecting, reviewing, and producing additional documents responsive to the City's RFPs, Set Five, served on March 15, 2024. DoorDash also continues to collect, review, and prepare for production additional documents responsive to agreements reached stemming from the meet-and-confer letters and meetings that occurred ahead of the Court's motion-to-compel deadline on May 15, 2024.

DATED: June 14, 2024

Respectfully submitted,

**CITY OF CHICAGO DEP'T OF LAW,  
AFFIRMATIVE LITIGATION  
DIVISION**

**COHEN MILSTEIN SELLERS & TOLL PLLC**

By: /s/ Peter H. Cavanaugh  
Stephen J. Kane  
Peter H. Cavanaugh  
121 N. LaSalle St.  
Room 600  
Chicago, IL 60602  
Phone: (312) 744-6934  
stephen.kane@cityofchicago.org  
peter.cavanaugh@cityofchicago.org

By: /s/ Brian E. Bowcut  
Brian E. Bowcut (*pro hac vice*)  
Peter S. Ketcham-Colwill (*pro hac vice*)  
1100 New York Avenue, NW, Suite 500  
Washington, D.C. 20005  
Phone: (202) 408-4600  
bbowcut@cohenmilstein.com  
pketcham-colwill@cohenmilstein.com

Lisa M. Ebersole (*pro hac vice*)  
88 Pine Street, 14th Floor  
New York, NY 10005  
Phone: (202) 408-4600  
lebersole@cohenmilstein.com

*Attorneys for Plaintiff City of Chicago*

**GIBSON, DUNN & CRUTCHER LLP**

By: /s/ Michael Holecek  
Joshua S. Lipshutz (pro hac vice)  
1050 Connecticut Avenue NW  
Washington, DC 20036  
Phone: (202) 955-8500  
jlipshutz@gibsondunn.com

Michael Holecek (pro hac vice)  
Cynthia Chen McTernan (pro hac vice)  
333 S. Grand Avenue  
Los Angeles, CA 90071  
Phone: (213) 229-7000  
mholecek@gibsondunn.com  
cmcternan@gibsondunn.com

**FORDE & O'MEARA LLP**

By: /s/ Michael K. Forde  
Michael K. Forde  
Brian P. O'Meara  
191 North Wacker Drive  
31st Floor  
Chicago, Illinois 60606  
Phone: (312) 641-1441  
mforde@fordellp.com  
bomeara@fordellp.com

**RILEY SAFER HOLMES  
& CANCELA LLP**

By: /s/ Patricia Brown Holmes  
Patricia Brown Holmes  
Sarah E. Finch  
70 W. Madison Street  
Suite 2900  
Chicago, IL 60602  
Phone: (312) 471-8700  
pholmes@rshc-law.com  
sfinch@rshc-law.com

*Attorneys for Defendants DoorDash, Inc. and Caviar,  
LLC*